

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
YVONNE L. TINES JONES,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO. 05-10082-EFH
)	
NORMAN Y. MINETA, Secretary,)	
U.S. Department of Transportation,)	
)	
Defendant.)	
_____)	

JOINT MOTION TO EXTEND DISCOVERY PERIOD

The parties hereby jointly and respectfully move that the Court extend the discovery period in the action to September 14, 2007. In support of this motion, the parties state as follows:

1. This is an action by a former federal employee alleging discrimination in employment, which allegations defendant denies.
2. The parties have been proceeding with discovery in this matter, but production has been slowed due to the delay of exchange of documents between the prior and current plaintiff's counsel.
3. The undersigned government counsel is transferring to the Criminal Division of the U.S. Attorney's Office beginning March 1, 2007 and this matter will be assigned to a new Assistant U.S. Attorney forthwith. That counsel, who will shortly be filing an appearance in this matter, will require time to get up to speed.

4. Although the parties have been diligent, they do not believe, given the above, that all discovery, including depositions and other third-party discovery, can be completed within the time set forth in the current pre-trial schedule.

5. The parties believe that an extension of the discovery period until September 14, 2007 will permit them to prepare, and possibly resolve, this case in a thorough and orderly fashion.

6. The parties respectfully submit that such an will not unduly delay the resolution of this matter and will not prejudice any party.

7. The parties further request that the Court reset the March 20, 2007 status conference for a date in September 2007 (other than September 13, 2007) as the March date will not allow new counsel sufficient time to get up to speed on this case.

WHEREFORE, the parties jointly move that the Court allow this extension of the pretrial schedule of this matter.

Respectfully submitted,

YVONNE L. TINES JONES

/s/Mitchell J. Notis/EMC

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NORMAN Y. MINETA, Secretary
U.S. Department of Transportation

By their attorney,

/s/ Eugenia M. Carris

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